Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of	)	
	)	
Amendment of Parts 1, 21, 73, 74 and 101 of the Commission's Rules to Facilitate the Provision of Fixed and Mobile Broadband Access, Educational and Other Advanced Services in the 2150-2162 and 2500-2690 MHz Bands	)	WT Docket No. 03-66 RM-10586
	)	
Part 1 of the Commission's Rules - Further Competitive Bidding Procedures	)	WT Docket No. 03-67
	)	
Amendment of Parts 21 and 74 of the Commission's Rules With Regard to Licensing in the Multipoint Distribution Service and in the Instructional Television Fixed Service for the Gulf of Mexico	)	WT Docket No. 02-68 RM-9718
	)	
Review of the Spectrum Sharing Plan Among Non-Geostationary Satellite Orbit Mobile Satellite Service Systems in the 1.6/2.4 GHz Bands	)	IB Docket No. 02-364
	)	
Amendment of Part 2 of the Commission's Rules to Allocate Spectrum Below 3 GHz for Mobile and Fixed Services to Support the Introduction of New Advanced Wireless Services, Including Third Generation Wireless Systems	)	ET Docket No. 00-258

To: The Commission

JOINT COMMENTS

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TABLE OF CONTENTS

SUMMARY

Bridge the Divide Foundation, Inc. ("Bridge"), Rocky Mountain Broadband, LLC ("Rocky Mountain") and Auburn Broadband, LLC ("Auburn") (collectively, "Joint Commenters") are, respectively, an incumbent EBS licensee and two affiliated commercial lessees of EBS spectrum. In these Joint Comments, they propose that: a) any incumbent EBS licensee within a BTA be entitled to bid at auction for any white space *on any EBS channel* within the same BTA (not just the channels on which it is an incumbent); b) that the BTA be the geographic service area for EBS auctions, so that EBS auction license service areas would conform to those of the adjacent BRS spectrum; c) that "incumbency" be defined by reference to an incumbent GSA's centroid, or center reference point, and not to the entire GSA; d) that the Commission afford the universe of incumbent EBS licensees within a particular BTA a window within which to negotiate a full-market settlement and avoid any auction; e) that EBS auctions should be single-round, sealed bid auctions, such as the Commission has used in the cellular arena, as opposed to simultaneous multiple-round auctions; and f) that where there are no incumbent licensees, eligibility should be opened to new EBS entrants.

The Joint Commenters believe that the foregoing proposals would strike an appropriate balance among the competing public interest objectives. These proposals would allow incumbent licensees a fair opportunity to negotiate among themselves consistent with their respective educational objectives. Licensees would be appropriately incented to achieve settlements, or face the uncertainty and inefficiencies of an auction. The resulting EBS landscape will better reflect the public's demand for educational and other wireless services, without the Commission expending time and administrative resources for a large number of auctions that could jeopardize planned deployments. Also, there would be an opportunity for new EBS entrants as well.

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JOINT COMMENTS

Bridge the Divide Foundation, Inc. ("Bridge"), Rocky Mountain Broadband, LLC ("Rocky Mountain") and Auburn Broadband, LLC ("Auburn") (collectively, "Joint Commenters") hereby

submit their Joint Comments in the above-captioned proceeding[1] to propose an efficient licensing mechanism that will rapidly assigned Educational Broadband Service ("EBS") "white space" spectrum. As further described below, the Commission can best promote the public interest by licensing "white space" spectrum pursuant to a single-round sealed-bid auction of those incumbent EBS licensees in a Basic Trading Area ("BTA") that desire additional EBS spectrum in that BTA. Consistent with procedures successfully utilized in other FCC auctions involving a small number of eligible bidders, the applicants would have an opportunity prior to the auction to resolve application conflicts to rationalize their spectrum holdings in accordance with their educational objectives.

Description of Joint Commenters

Bridge is a 501(c)(3) tax exempt corporation that holds EBS licenses for the A-Group channels in Aspen, Colorado (Call Sign WND368) and the A-Group channels in Vail, Colorado (Call Sign WND352). The Geographic Service Areas ("GSAs") of the Vail station lies entirely within the Denver, Colorado BTA; that of the Aspen station lies mainly within the Denver BTA, although a portion of the GSA contour extends into the adjoining Grand Junction, CO BTA (BTA No. 168). Excess capacity on the stations is leased to Rocky Mountain pursuant to applications approved by the FCC in 2006.[2]

The Denver BTA (B110) is extremely large and irregularly shaped. It occupies more than 47,000 square miles from one end of the state of Colorado to the other and even includes three counties in Kansas. The Rocky Mountains run north-south through the heart of the BTA, with

[1] *In the Matter of Amendment of Parts 1, 21, 73, 74 and 101 of the Commission's Rules to Facilitate the Provision of Fixed and Mobile Broadband Access, Educational and Other Advanced Services in the 2150-2162 and 2500-2690 MHz Bands*, Third Order on Reconsideration and Sixth Memorandum Opinion and Order and Fourth Memorandum Opinion and Order and Second Further Notice of Proposed Rulemaking and Declaratory Ruling, FCC 08-83, rel. March 20, 2008 ("*FNPRM*").

[2] *See* Lease IDs L000000320 and L000000321.

rural prairieland to the east and hills to the west. The terrain and foliage significantly limit the EBS signals.

Rocky Mountain is a commercial operator that desires to provide WiMAX services in and around the Aspen and Vail communities. These communities rest in valleys surrounded by large mountain peaks. Unfortunately, yet significantly, *there are no other EBS channels licensed in these communities* – the closest EBS GSA center point is located more than seventy miles away across the Continental Divide, and serves the geographically distinct Denver metropolitan area.[3] With access to only three non-Midband EBS channels in each market, Rocky Mountain can accumulate only 18 MHz of usable Wi-Max spectrum and therefore cannot develop a viable wireless broadband business. Consequently, the educational potential of full 4G Wi-Max, which the Commission intended be utilized for educational purposes in allocating the spectrum for EBS, cannot be realized.[4] If, however, Bridge could obtain additional EBS spectrum in these small markets, without the cost of acquiring channels covering the entire BTA or some other large geographic area through auction, together with Rocky Mountain it could provide a viable, competitive and valuable service to the public.

Auburn, which shares common ownership with Rocky Mountain, holds EBS rights in the Auburn-Opelika, Alabama market. It has agreements with Clarendon Foundation and Southern Union State Community College ("SUSCC"), EBS licensees in that BTA.[5] Although Auburn itself thus has access to sufficient spectrum to implement 4G Wi-Max service, Rocky Mountain also must have sufficient spectrum, so the two companies can realize economies of scale with respect to

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[3] *See* Exhibit 1, map showing GSAs of EBS stations in the Denver BTA.

[4] It is widely recognized that at least thirty MHz of spectrum is needed for Wi-MAX technology. *See, e.g.*, "*Sprint Nextel Set to Roll Out Wi-MAX,*" RCR Wireless Magazine, September 8, 2008 (copy of article attached hereto for convenience).

[5] The agreement with SUSCC will activate upon grant of SUSCC's pending, unopposed, timely-filed renewal applications.

financing, management functions, purchasing power, back office and roaming arrangements. Thus, the proposals set forth in these comments, if implemented, will contribute to the full and rapid deployment of 4G Wi-Max service in the Auburn-Opelika market, as well as Aspen and Vail.

DISCUSSION

Background

In the *FNPRM*, the Commission cites the "additional demand for EBS spectrum" resulting from the new technical rules and band plan, and notes that "EBS eligible entities have not been able to file applications for new stations since 1995."[6] Given this demand, the Commission invites "comment on a mechanism for assigning EBS licenses by competitive bidding among applicants, as well as through other means that would avoid mutual exclusivity among applications, obviating any need for competitive bidding."[7]

The Joint Commenters propose a licensing plan that would balance the interests of incumbents and commercial entities that require additional spectrum and new entrants that desire to acquire available spectrum. This plan would not only afford incumbents an opportunity to enhance their spectrum holdings but would, in large part, eliminate the need for auctions in many areas, an alternative the Commission specifically intends to consider.[8] A detailed description of this proposal follows.

I. The BTA Should Be the Geographic Bidding Unit.

As the Commission noted,[9] many commenters support the BTA as the geographic bidding unit for EBS licenses. This area corresponds to the areas auctioned for the Broadband Radio Service ("BRS") in 1996. Historically, EBS and BRS stations were co-located under the site-specific

[6] *FNPRM* at ¶182 (citation omitted).
[7] *Id.* at ¶187.
[8] *Id.*
[9] *See FNPRM, supra,* at ¶ 194.

licensing regime that predated the geographic licensing rules. Subsequently, BRS licenses were auctioned by BTA. Changing at this point to a different geographic area for auctioning EBS spectrum would create confusion and stymie the usability of the white spaces spectrum. Such a return to the patchwork quilt licensing regime previously rejected by the Commission[10] would do violence to the development of wireless broadband services.

II. Where Incumbents Exist, Only They Should Be Eligible to Bid.

The Commission should revise Section 27.1201 to limit eligibility for the "white space" auction to those incumbent EBS licensees that have a GSA center point ("centroid") in that BTA.[11] As the Commission correctly observed, EBS licensees have had no opportunity over the last 13 years to apply for new authorizations, despite the presence of large "white areas" on various channels throughout the country and the increasing demand for spectrum.[12] Some licensees may wish to expand geographic territory while others may wish to increase their spectrum holdings in a smaller area. For example, Bridge should be eligible to bid for available EBS white space on any channels in the Denver BTA. While Bridge may have limited interest in expanding its service area into new communities within the BTA, it has a strong interest in adding spectrum to its channels in the Aspen and Vail communities. Conversely, in the Denver metropolitan area where there is little or no unassigned EBS spectrum, an EBS licensee may want to expand its existing 35-mile GSA to cover a larger geographic area, but may have no interest in serving distant communities like Aspen and Vail.

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[10] *See In the Matter of Amendment of Parts 1, 21, 73, 74 and 101 of the Commission's Rules to Facilitate the Provision of Fixed and Mobile Broadband Access, Educational and Other Advanced Services in the 2150-2162 and 2500-2690 MHz Bands*, Order on Reconsideration and Fifth Memorandum Opinion and Order and Third Memorandum Opinion and Order and Second Report and Order, 21 FCC Rcd. 5606, 5641-42 (2006) ("*Transition Recon Order*").

[11] The reasons for this limitation are explained in Part VI, *infra*.

[12] *Id.* at ¶182.

By limiting eligibility to EBS incumbents in the BTA, the Commission can "ensure that licenses are disseminated among a wide variety of applicants," consistent with its objectives.[13] A small group of sponsored bidders, likely backed by well-funded commercial interests, would not be able to acquire the vast majority of "white space." From the results of recent AWS-1 and 700 MHz auctions where eligibility was open to all and the large companies dominated, the Commission can certainly appreciate the pitfalls of unlimited eligibility. Here, where a "wide variety" of incumbents have had no opportunity for 13 years to modify their licenses, it is reasonable for the Commission to limit auction eligibility in a manner that also promotes diversity.

III. There Should Be a Pre-Short Form Settlement Window.

To facilitate the rationalization of EBS markets, the Commission should afford eligible parties a short period of time – say, 30 days – before the short-form filing deadline to achieve a full-market settlement among all such eligible parties. This period would be triggered by the release of a public notice listing the incumbent EBS licensees for each BTA, *i.e.*, the parties eligible to participate in the competitive bidding process, and establishing a deadline for the eligible EBS parties in a given BTA to achieve a full-market settlement. During this period, eligible EBS licensees would have an opportunity to divide the spectrum and/or geographic area in ways that conformed their spectrum rights to their educational objectives. The EBS licensees also could form a consortium or other entity where they share in the benefits. Using the example from above, Bridge would have the opportunity to negotiate the rights to, for example, the B-Group, C-Group or D-Group channels in Vail and Aspen and relinquish rights to other EBS channels in the remainder of the BTA. The EBS licensees covering the city of Denver may be able to negotiate an expanded territory to cover outlying areas on the eastern side of the Continental Divide, and avoid an auction with Bridge

[13] *Id.* at ¶190.

concerning those areas. If successful, the eligible parties would file the settlement agreement with the Commission on or before the deadline for filing short-form applications.[14]

Over the years, full market settlements have proved to be an efficient and effective way to promote expeditious licensing and service to the public.[15] In this case, a settlement would allow licensees to determine the best combination of spectrum and area for their specific educational purposes, rather than facing the untenable choice of either bidding on more spectrum than they need – an uncertain and inefficient outcome – or foregoing the opportunity altogether because the auctioned licenses do not correspond to the licensees' objectives. The Commission also would avoid the time and expense of an auction for any BTA where the eligible EBS licensees reached a full market settlement.

If the incumbent licensees do not reach a full-market settlement, they would have the right to file short form applications for a "white area" authorization for the BTA. Applicants could select one or more channel groups, with the Middle Band Segment ("MBS") channel separated from the Upper Band Segment ("UBS") and Lower Band Segment ("LBS") channel groups. In other words, the applicant would select one or more of the following boxes for the BTA where its GSA center point is located: A1-A3, B1-B3, C1-C3, D1, D3, G1-G3, A4, B4, C4, D4 and G4. This license allocation scheme affords applicants maximum flexibility to implement educational service plans, without requiring an applicant interested only in low-power spectrum to bid for MBS spectrum or

[14] As the *FNPRM* states, the Commission established a settlement period in 2000 for EBS applicants to resolve mutual exclusivity. *See FNPRM* at ¶183.

[15] *See, e.g.,* Public Notice, *Wireless Telecommunications Bureau Approves Settlement Agreement between Keystone Wireless, Inc. and Verizon Wireless (VAW) LLC*, DA 08-1165, released May 15, 2008 (settlement agreement "is in the public interest because it resolves the mutual exclusivity of the subject applications filed by the two parties and facilitates cellular coverage to previously unserved areas."); *In re Settlement Agreement and Request for Waiver of Section 1.935 of the Commission's Rules*, 22 FCC Rcd. 4027 (Mobility Div., 2007) at ¶ 12 (settlement agreement "is in the public interest because it would permit the resolution of a long-standing and litigious dispute among the Joint Parties and would expedite cellular service to consumers in New Mexico").

vice versa. Moreover, if a licensee holds an A-Group license, it may only be interested in contiguous spectrum (*i.e.*, the B-Group), and should not be required to bid on the other available spectrum. Upfront payment amounts would be calculated based on the MHz*pop value of the selected markets.[16]

If more than one short-form application for the same channels were filed, Commission staff would determine the applications to be mutually exclusive.[17] Because eligibility in any given BTA would be limited to incumbent licensees holding authorizations whose centroid is within that BTA, the number of short-form applications would be manageable.

IV. Auctions Should Be Single-Round, Sealed Bid.

For each case where mutual exclusivity exists, the Commission should conduct a single-round, sealed-bid auction, an efficient practice the Commission has successfully utilized in previous auctions. In the recently-concluded Auction No. 77 for cellular unserved areas, the Commission determined that such an auction design is preferred over a simultaneous multiple-round auction "because the informational advantages of a simultaneous multiple-round auction are not necessary here. Because a bidder can only bid on a single cellular unserved area, bidders do not need the information afforded by a simultaneous multiple-round auction to consider valuations, alternative business plans, or backup strategies."[18] The same situation holds true here. With eligibility limited to incumbents having a center point within a BTA, bidders would have no reason to need

[16] For example, Attachments 1 & 2 attached hereto show the current GSA contours within the Denver BTA for channel groups A&B. The areas inside these incumbent GSAs are not available at auction and should be excluded when calculating upfront deposits.

[17] *See* Implementation of Section 309(j) of the Communications Act – Competitive Bidding, PP Docket No. 93-252, *Second Report and Order*, 9 FCC Rcd 2348, 2376 ¶ 165 (1994) ("*Competitive Bidding Second Report and Order*").

[18] Public Notice, "Closed Auction of Licenses for Cellular Unserved Service Areas Scheduled for June 17, 2008; Comment Sought on Competitive Bidding Procedures For Auction 77," DA 08-543 (2008), at pp.2-3. *See also* Public Notice, "Closed Auction of Licenses for Cellular Unserved Service Areas Scheduled for June 17, 2008," DA 08-926 (Apr. 25, 2008), at p.27.

information about other markets, as would be the case in a simultaneous multiple-round auction.

On the bid submission deadline designated by the Commission, each qualified short-form applicant would have the opportunity to submit a bid for channel groups it selected. The Commission would simply select the highest bid and announce that decision in a public notice the following day. The Commission would not have to go through the administratively taxing and cumbersome ordeal of multiple rounds that last for weeks – the outcome and amount would be known almost instantaneously, and by issuing licenses shortly thereafter, the Commission could enable service to be deployed more quickly.

V. BTAs Should Be Open to New Entrants Where There Are No Incumbent Licensees.

For any BTA with no existing EBS licensees or for which no incumbent submits a short-form application, the Commission should accept short-form applications from any entity eligible under the existing provisions of Section 27.1201(a) of the Commission's Rules. As set forth below, if one limits the definition of "incumbent" as proposed in Part VI, *infra*, there will be a number of BTAs where there is no incumbent at all, providing an opportunity for new entrants.

VI. "Incumbency" Must Be Based on Centroids, Not GSA/BTA Overlap.

It is important to limit eligibility to EBS incumbents whose centroid lies within a given BTA, as opposed to all those whose protected GSA might extend partially into such BTA. Enabling any licensee whose GSA even touches a BTA to bid will defeat the purpose of limiting eligibility in the first place – keeping a manageable number of persons in the universe of potential bidders – and thereby hamstrings the possibility of achieving full market settlements among serious applicants. Many GSAs extend into multiple BTAs. For example, the Clarendon EBS license under call sign WND324 has its centroid in the Auburn-Opelika BTA, but has a GSA which extends also into five other BTAs! Allowing any licensee whose GSA overlaps a BTA even slightly to sit at the nego-

tiating table is an invitation to greenmail from persons whose real interests lie in the adjoining BTA.

Also, if an incumbent EBS licensee can claim eligibility just due to BTA/GSA overlap, it would severely limit the number of BTAs open to new entrants, and would defeat the goal of balancing the interests of incumbents and those of new entrants. Virtually every BTA would then have an "incumbent." While there are BTAs with no incumbent whose centroid is located therein, there are hardly any without any GSA overlap.

Conclusion

The process proposed herein for assigning available EBS spectrum provides the best means to serve the public interest, by allowing incumbent licensees a fair opportunity to negotiate among themselves consistent with their respective educational objectives. Licensees would be appropriately incented to achieve settlements, or face the uncertainty and inefficiencies of an auction. The resulting EBS landscape will better reflect the public's demand for educational and other wireless services, without the Commission expending time and administrative resources for a large number of auctions that could jeopardize planned deployments.

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Respectfully submitted,

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Sprint Nextel set to roll out WiMAX

U.S. adoption rate remains to be seen

Allie Winter

Story posted: September 8, 2008 - 5:59 am EDT

As Sprint Nextel Corp. and Clearwire Corp. gear up for an initial market launch of its mobile WiMAX network this month, the duo is under pressure to deliver on the fledgling technology.

Continuous delays in rolling out the technology have haunted Sprint Nextel. John Polivka, spokesman for Sprint Nextel, said the carrier recently announced news to debut WiMAX service in Baltimore in September, the first U.S. market.

"We are also planning to launch service in Washington, D.C., and then Chicago sometime in the fourth quarter," Polivka said. "Sprint has additional markets in various stages of network development. These include Boston, Philadelphia, Dallas and Fort Worth."

Sprint Nextel and Clearwire have touted WiMAX's time-to-market advantage over rival LTE technology. Bill Ho, of Current Analysis, said the slow rollout has harmed Sprint Nextel's reputation and puts pressure on the carrier to perform.

"Initially the hopes were by the summer and now it appears to be in September and that has been a disappointment which doesn't help Sprint's executions credibility," Ho said. "Barry West, Sprint's driver and the new Clearwire president, admitted that there have been backhaul issues. Of course, there are some other intangibles and potential issues."

"Sprint has a significant position," said Mohammad Shakouri, board member and VP of the WiMAX Forum. "It's a big advantage when you think about how fast it is ramped up."

For WiMAX and more generally, broadband, the biggest fundamental issue is spectrum, Shakouri said. He said that 30 megahertz of clean spectrum is needed to fuel a broadband highway, and with Sprint Nextel and Clearwire's spectrum depth in the 2.5 GHz band, which reaches as deep as 200 megahertz in some markets, they're revved to go.

In addition to its spectrum holdings, Sprint Nextel and Clearwire are also set to pocket $3.2 billion in investments from Intel Corp., Google Inc., Time Warner Cable, Comcast Corp. and Bright House Networks once their merger is approved.

International importance

Rolling out wireless broadband service in the United States may be a little more difficult because of the nation's wired infrastructure, Shakouri noted.

"[In undeveloped countries], it's a government priority," Shakouri said. "Decisions with broadband are of national interest."

Gerry Purdy, analyst with Frost & Sullivan, also noted WiMAX's impact around the world.

"It's doing quite well outside the United States as a network technology that can deliver network and DSL where there is none," Purdy said. "But we, in the U.S. tend to think we're the whole world."

So what's stopping the U.S.?

Purdy anticipates that because the Sprint Nextel/Clearwire partnership is still up in the air and the investment checks haven't been cashed, the impact of the new Clearwire cant' yet be measured.

"The new Clearwire is a company that hasn't seen the light of day yet," Purdy said. "The old Clearwire was able to do its own kind of rollout, but now it has all the Sprint WiMAX resources built into it. In 2009, we'll see how that company takes the company and capital from Sprint."

Questions remain

Another roadblock for any new technology is understanding how it behaves in a real-world environment. WiMAX is all about broadband; it's not about creating new phones, Shakouri said. People and customers do not subscribe to WiMAX, their devices do, Shakouri said.

Although it's been in trials and we know it will work, Purdy said WiMAX technology will not win people over until they can test it.

"We need to have an opportunity to see how these things will develop in the marketplace," Purdy said.

However, Purdy continues to remain optimistic for WiMAX's future, saying he loves to see new paradigm shifts and new technologies.

"It's not fair to talk about failure," Purdy said. "This is a case where WiMAX has some promising elements."

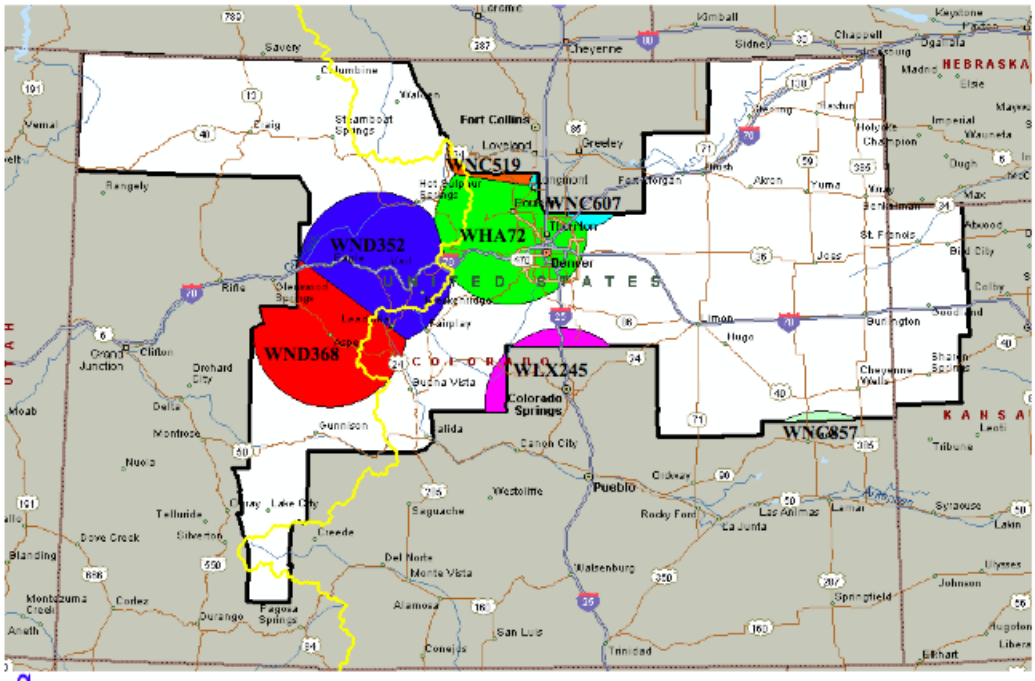
Purdy went on to compare the launch of WiMAX to the launch of Wi-Fi. Many people were skeptical and didn't have complete faith in the Wi-Fi technology, Purdy said. Eventually it caught on in stores, homes, almost anywhere, in what Purdy called "an explosion." Shakouri keeps that same hope for the United States, knowing what must be done.

"Our only battle is the industry battle," Shakouri said.

SPRINT NEXTEL/CLEARWIRE is set to launch its first commercial mobile WiMAX service in Baltimore this month.

Joint Comments, Attachment 1, Current A-Group GSAs

GSA Map: EBS Channel Group A
BTA #110: Denver, CO



Joint Comments, Attachment 2, Current B-Group GSAs

GSA Map: EBS Channel Group B
BTA #110: Denver, CO